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*Attorneys for Defendants International
 Longshoremen's Association, Local 1235,
 Brandon Garcia, and Frank Agosta*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY**

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WILFREDO PAGAN,

Plaintiff,

v.

A.P. MOELLER-MAERSK, CORP.,
 INTERNATIONAL LONGSHOREMEN'S
 ASSOCIATION, LOCAL 1235, APM TERMINALS
 ELIZABETH, LLC, BRANDON GARCIA, JOHN
 WILLIAMS, MARK PROCACCINI, FRANK
 AGOSTA, SUSAN WINFREE, JOHN/JANE DOES
 1-10,

Defendants.

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**CERTIFICATION OF
 DEFENDANT
 BRANDON GARCIA**

Civ. Action No.
 2:24-cv-09564-BRM-JBC

**CERTIFICATION OF BRANDON GARCIA
 IN SUPPORT OF THE UNION DEFENDANTS' MOTION TO DISQUALIFY**

I, BRANDON GARCIA, hereby certify as follows:

1. I am the President of Defendant ILA Local 1235 (“Local 1235”), a local union affiliate of the International Longshoremen’s Association, (“ILA”) based in the Ports of Newark and Elizabeth, NJ (“the Port”).

2. Local 1235 represents a bargaining unit of port workers who work for marine terminals in the Port. Local 1235-represented employees are employed to move containerized cargo to and from the marine terminal using mechanized equipment such as cranes, straddle carriers, yard trucks or forklifts.

3. This bargaining unit is employed by Defendant APM Terminals Elizabeth, LLC (“APM”) and several other marine terminal operator employers.

4. The Plaintiff, Wilfredo Pagan, is a member of the relevant bargaining unit and also a member ILA Local 1235.

5. Plaintiff has engaged the Law Offices of Peter W. Till (the “Till Offices”) to file the instant lawsuit against Local 1235 and me, among others.

6. In 2018, I was a client of the Till Offices.

7. I had hired Peter Till to help me prepare for and to represent me during an interview before the ILA’s Ethical Practices Officer.

8. This was an administrative process that was governed by the terms of the ILA Constitution in order to determine my fitness to hold union office as I had not previously held an elected position.

9. Accordingly, pursuant to the terms of the ILA Constitution, I was required to appear before the ILA’s Ethical Practices Officer (who at the time was Hon. Joel Pisano).

10. In anticipation of this interview, I hired Peter Till to assist me in preparing for this interview and to represent me during the interview.

11. Till and I spoke on several occasions to discuss strategy and the role of a union officer as representative of the bargaining unit under the terms of the ILA Constitution, Local 1235's by-laws, and the local collective bargaining agreement.

12. Peter Till communicated with Judge Pisano on my behalf and appeared with me for my September 6, 2018 interview before Pisano.

13. Because of the interview, Pisano ruled that I was fit to hold union office and cleared me to run for president.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Brandon Garcia

Dated: October 22, 2024